

1 Pamela M. Egan, WSBA No. 54736 (*pro hac vice*)

2 Paul H. Beattie, WSBA No. 30277

3 CKR Law LLP

4 506 2<sup>nd</sup> Avenue, 14<sup>th</sup> Floor

5 Seattle, WA 98114

6 Telephone: (415) 297-0132

7 Facsimile: (206) 582-5001

8 Email: pbeattie@ckrlaw.com

9 *Attorneys for Mark D. Waldron, Chapter 11 Trustee*

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

Case No. 18-03197 FPC 11

GIGA WATT, Inc., a Washington  
corporation,

Chapter 11

Debtor.

**NOTICE OF CHAPTER 11  
TRUSTEE'S MOTION FOR ORDER  
APPROVING MOSES LAKE TWO-  
WAY AGREEMENT**

**PLEASE TAKE NOTICE** that Mark D. Waldron, in his official capacity as the Chapter 11 Trustee (the "Trustee"), has moved (the "Motion") the Court pursuant to 11 U.S.C. §§ 363 and 364 and Fed. R Bankr. Proc. 4001 for an Order approving the *Agreement to Settle Relief from Stay Motion, Obtain Super Priority Unsecured Credit and Re-Enter the Premises* (the "Moses Lake Two-Way Agreement").

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Motion, the Trustee requests the Court's approval of the Moses Lake Two-Way Agreement pursuant to which the Trustee is re-opening a portion of the Debtor's operations,

Notice of Chapter 11 Trustee's Motion  
for Order Approving Agreement, etc. - Page 1

1 borrowing the sum of \$169,500.19 at 19.9% interest on an unsecured super-  
2 priority basis, and entering into a revenue-sharing agreement with the Moses Lake  
3 Landlords until administrative liabilities to the Moses Lake Landlords are current.

4 **PLEASE TAKE FURTHER NOTICE** that the Motion and its supporting  
5 papers and exhibits may be obtained from the Clerk of the above-captioned Court.

6 **PLEASE TAKE FURTHER NOTICE** that if you oppose the Motion,  
7 then **within twenty-four day (24) days from the date of service by mail of this**  
8 **Notice set forth below**, you must file your written response with the Court Clerk,  
9 U.S. Bankruptcy Court, E.D. WA, 904 West Riverside Ave., Suite 304, Spokane,  
10 WA 99201 or, if by mail, the Court Clerk, U.S. Bankruptcy Court, E.D. WA, P.O.  
11 Box 2164, Spokane, WA 99210-2164 **and** serve a copy upon (1) undersigned  
12 counsel at CKR Law LLP, 506 Second Ave., 14<sup>th</sup> Floor, Seattle, WA 98114 and  
13 (2) James Perkins, Office of The United States Trustee, 920 West Riverside  
14 Avenue, Suite 593, Spokane, WA 99201-1012.

15 **PLEASE TAKE FURTHER NOTICE** that the Court may enter an order  
16 without actual hearing or further notice unless a written objection is timely served  
17 and filed. If an objection is timely served and filed, you will receive notice of the  
18 date and time of a hearing on your objection.

19 **DATE OF SERVICE BY MAIL: APRIL 8, 2019**

20 Dated: April 5, 2019

CKR LAW LLP

21 By: /s/ Paul H. Beattie  
22 Paul H. Beattie (WSBA No. 30277)

23 *Attorneys for Mark D. Waldron, Chapter 11  
Trustee*

24 Notice of Chapter 11 Trustee's Motion  
25 for Order Approving Agreement, etc. - Page 2